TRISTAR LICENSE GROUP, LLC

FCC Meetings to Discuss Revisions of FCC Bidding and DE Rules

June 8 – 9, 2015

I. TRISTAR: THE TYPE OF DE ENVISIONED BY THE ACT

- **Tristar is a unique DE, i.d., one not affiliated with any large carrier or rural telco. It consists of an experienced management team and over 200 separate investors. Tristar won twelve licenses in Auction No. 97.**

- **Tristar's Management Team Has a Rich History of Building and Operating Wireless Systems. See attached maps.**

- **Grant of Bid Credits to Tristar would comply with the statutory mandates to promote competition and provide small businesses with an opportunity to participate in the provision of spectrum-based services.**

II. CHANGES TO THE DE PROGRAM NEEDED THE COMMISSION TO COMPLY WITH THE ACT

- **In order to compete, DE's need the type of operational flexibility that the AMR Rule currently prohibits.**

- **DEs should be permitted to transfer or exchange, or sell without penalty, at any time, if pursuant to business plan or if proceeds are to be re-invested into the business.**

- **DEs need the flexibility to meet build outs on a license-by-license basis or on a portfolio basis at their election.**

- **There should be no early construction obligations for DE licensees.**

- **DEs should be assigned those licenses within a market that have the least interference.**

- **The revenue threshold for bid credits should be increased as proposed by the Commission.**

- **The percentage of bidding to be included in credits should be increased to 40%.**

- **Joint bidding agreements should be prohibited.**

III. STATUTORY MANDATES

- **309(c) (3)(B) requires the Commission to**

  - **Promote competition**

  - **Avoid excessive concentration of licenses**

  - **Disseminate licenses to a wide variety of licensees, including**

    - **small businesses**

    - **rural telcos**

    - **minorities, and**

    - **women**

  - **SECTION (j) (4)(D)**

    - **requires the Commission to ensure that the above protected groups "are given the opportunity to participate in the provision of spectrum-based services."**

    - **the above protected groups are the <u>sole</u> and <u>only</u> intended beneficiaries of Section 309 (j)(4)(D).**

TeleCorp/SunCom Territory

Other SunCom Affiliates

AT&T and Roaming Partners